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Attorneys for Defendant,

NJ Transit Bus Operations Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SINOWA JOHNSON,

Plaintiff,

v.

NJ TRANSIT BUS OPERATIONS INC. d/b/a/
NJ TRANSIT AND ATU LOCAL 880,

Defendants.

Hon. Karen M. Williams, U.S.D.J.

Hon. Elizabeth A. Pascal, U.S.M.J.

Civil Action No. 1:25-02528 (KMW/EAP)

DECLARATION OF COUNSEL

Travis M. Anderson, of full age, having been duly sworn according to law, do of my own personal knowledge, make the following statements by way of declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am licensed to practice law in the State of New Jersey and admitted to practice law before the United States District Court for the District of New Jersey.

2. I am an Associate Attorney at the law firm of Cruser, Mitchell, Novitz, Sanchez, Gaston & Zimet, LLP, attorneys for Defendant, NJ Transit Bus Operations, Inc. (“Defendants”), in the above-captioned matter. I submit this Declaration of Counsel in support of Defendant’s motion to stay discovery pending a decision on the motion to dismiss Plaintiff, Sinowa Johnson’s (“Plaintiff”) Complaint, with prejudice, for failure to state a claim and lack of subject matter jurisdiction.

3. Attached hereto as **Exhibit 1** is a true and accurate copy of Plaintiff's Complaint.

4. Attached hereto as **Exhibit 2** is a true and accurate copy of Defendant NJT's Motion to Dismiss for Lack of Subject Matter Jurisdiction and Failure to State a Claim, filed on June 2, 2025.

I certify under the penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Travis M. Anderson

Travis M. Anderson, Esq.

Dated: August 8, 2025